

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SUSAN WHITE, as Personal Representative
for the Estate of KAYLA WHITE, deceased,
and CODY CAMPBELL, as Personal
Representative of the Estate of BRAEDIN
CAMPBELL, deceased,

Case No. 2:17-cv-12320

Hon. DAVID M. LAWSON

Plaintiffs,

v.

FCA US, LLC,
a foreign limited liability company, and
CLARENCE HEATH, individually,

Defendants.

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PLAINTIFFS' RULE 26 PRETRIAL DISCLOSURE EXHIBIT LIST

1. Plaintiffs submit their Exhibit List attached hereto as Attachment A.
2. Plaintiffs reserve the right to present, as additional exhibits, any modified versions of Exhibits.
3. Plaintiffs reserve the right to use any exhibits admitted by Defendants.
4. Plaintiffs reserve the right to use exhibits not listed here for impeachment or rebuttal purposes.
5. Plaintiffs reserve the right to supplement or amend this List any time prior to trial, and in accordance with and when, all rulings regarding objections and admissibility have been heard and decided.

6. By including documents on the following list, Plaintiffs do not waive their right to object to their introduction at trial by Defendant if Plaintiffs choose not to offer them as exhibits at trial.
7. Furthermore, the mere listing of these documents as potential exhibits is not a concession as to their relevance or admissibility, and Plaintiffs reserve the right to object to the admissibility of any of these potential exhibits.

Respectfully submitted,

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Dated: October 1, 2019

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send electronic notification of said filing to:

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I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants: None

RESPECTFULLY SUBMITTED,

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ATTACHMENT A

PRESIDING JUDGE DAVID LAWSON, DISTRICT JUDGE					PLAINTIFFS' ATTORNEY Courtney E. Morgan, Jr., et al	DEFENDANT'S ATTORNEY	
TRIAL DATE(S) DECEMBER 10, 2019					COURT REPORTER	COURTROOM DEPUTY	
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	MAY OR WILL	OBJECTION TO ADMISSIBILITY
1					Photographs, diagrams and other depictions related to the accidents on November 11, 2014, including any and all videos of the aftermath, including photographs from the Southfield Fire Department; Michigan State Police, Oakland County Medical Examiner, eyewitness and videos taken by local news stations		
2					Photographs and other depictions of the injuries suffered by decedents Kayla White and Braedin Campbell on November 11, 2014 including photographs from the Southfield Fire Department; Michigan State Police and Oakland County Medical Examiner		
3					Kayla White's medical records		
4					Any and all records regarding the collision created or compiled by law enforcement or first responders including records from the Michigan State Police Department, Southfield Fire Department, and Oakland County Medical Examiner's Office		
5					Autopsy Report and accompanying documentation from the Oakland County Medical Examiner's Office		
6					Exhibit 56 to the deposition of Clarence Heath		
7					Don Stevens Expert Report, Attachments and Supporting Documentation, including CV		
8					Michael Thomson, Ph.D.'s Expert Report, Attachments, and		

					Supporting Documentation, including CV		
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